

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC, 20554

In the Matter of )  
Creation of a Low ) MB Docket No. 99-25  
Power Radio )  
Service )

My name is Arlene Sweeting, and I strongly support any actions the Federal Communications Commission can take to expand and support the Low Power FM radio service.

WSLR is a brand new LPFM station in Sarasota, Florida. We appreciate the opportunity to comment on the FCC's Second Order on Reconsideration. We feel that LPFM is the perfect vehicle to promote localism and democratize the media in this country. Our volunteers are filled with energy and enthusiasm about the opportunity to take to the airwaves and talk about issues of local concern and play music not available on commercial stations. We strongly feel that LPFMs should be preserved for non-profit groups with a local support base and local volunteers. Time-shifted programming obtained via satellite does not meet the criteria to fulfill a locally originated programming pledge.

We support increasing the limit for minor modifications of transmitter site relocations from 2 kilometers to 5.6 kilometers. Our original transmitter site fell through at the last minute, giving us less than a month to secure a new location. The expansion of the allotted area for transmitter relocation enabled us to secure a new site and still meet our construction permit deadline. We support this change to help other LPFMs in similar situations.

In regards to transfer of licenses, we have an interesting situation. WSLR was created when The Sanctuary, a non-profit community organization, came to a M/X agreement with the New College Student Alliance (NCSA). The Sanctuary agreed to withdraw its license application and merge with the NCSA application. in return for having a joint board (made up of representatives from both

groups) govern the station. Thus the license was awarded to the New College Student Alliance, but governing authority for the station was vested in a separate organization. As this time, the NCSA has no direct involvement with the station, although there are New College alumni and student representatives on the Board. The new entity that was formed is WSLR, Inc. and we have been granted 501 © 3 status by the IRS. It seems that in situations where a new organization is created via an M/X agreement the FCC should authorize a transfer of license to the new entity.

We support the Commission's efforts to craft rules that will create flexibility for growing and changing LPFMs. Currently in our bylaws, half of our Board is scheduled to be elected annually starting in 2006. If elections were to result in a change in membership of 50% we would be in violation of FCC rules. We support a change that would allow such elections to take place as long as there is no change in the organization's mission and board members remain members of the local community.

We do not support allowing the sale of LPFM licenses. We think that eligibility for LPFM licenses should be permanently restricted to local entities and that multiple ownership of LPFMs should be prohibited.

In regards to the relationship between FM translators and LPFM stations we concur with Prometheus that LPFMs should be given primary status over translators, no matter who came first. In our case we have a translator located in the County to our North (Manatee County). It is retransmitting a signal from a station in Lakeland, Florida that is part of the Bible Broadcasting Network based in Charlotte, NC. They are not originating any local programming that we can determine and they are far exceeding their 60 dBu contour. If the FCC is a true supporter of localism in media they must give locally controlled and operated LPFM stations priority over translators. We appreciate the freeze that the FCC implemented over granting new FM translator construction permits to look into this issue further. After all the blood, sweat, and tears that go into getting LPFM Community Radio Stations on the air and building the community support to keep them on the air, it is

unconscionable that they would be knocked off the air by a station with non-local originated programming or a translator. We feel strongly that the FCC should do as much as possible to protect these gems of media democracy from encroachment.

We also support Prometheus's call for the FCC to uncover national entities trying to game the system by using low power stations as a front for their national networks. Operations that have no studio, no local volunteers, and nothing but a satellite downlink are nothing more than an attempt to network under the veil of LPFM. The LPFM licenses should be reserved for groups with a truly local focus.

Once again we appreciate the opportunity to comment on the proposed rulemaking.

Arlene Sweeting  
WSLR 96.5FM - Sarasota LOCAL Radio